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Attorney for **Benjamin D. Morrow**

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA

Plaintiff,

vs.

BENJAMIN D. MORROW

Defendant.

Case No. 3:19-cr-00041-MMD-WGC

**ORDER GRANTING PETITIONER
MORROW'S UNOPPOSED MOTION
AND DECLARATION IN SUPPORT
THEREOF FOR EXTENSION OF TIME
TO FILE TRAVERSE**

MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO OBJECTIONS

Pursuant to Rule 6 of the *Federal Rules of Civil Procedure*, counsel for Petitioner hereby requests a 60-day extension of time to file Petitioner's Traverse up to and including Monday, June 2, 2025.

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DECLARATION IN SUPPORT OF MOTION

I, Jason T. Campbell, am the attorney of record for Petitioner Benjamin Morrow in this case. I hereby declare as follows in support of this request for extension of time to file Petitioner's Traverse:

1. Current due date: April 2, 2025

On November 12, 2024, I filed a motion to vacate his conviction and sentence pursuant to 28 U.S.C. § 2255 on behalf of Petitioner. (Dkt. 144.) I simultaneously moved to be admitted to this jurisdiction *pro hac vice* in order to continue representing Petitioner in these proceedings, and the Court granted my motion on November 26, 2024. (Dkt. 143, 152.)

On December 31, 2024, the Court issued an order to show cause, setting March 3, 2025, as the due date for the Government's response, with Petitioner's Reply/Traverse due 30 days later. (Dkt. 156.) The Government filed its response on March 3, 2025, making April 2, the current due date for Petitioner's Reply/ Traverse.

2. Length of Requested Extension: 60 days

3. New due date if extension granted: June 2, 2025

4. Number of previous extensions by Petitioner: 0

5. Reason for extension request:

Due to other urgent matters, I have been unable to give this case the attention it requires. On March 23, 2025, I filed a 35-page brief in a habeas case challenging a first-degree murder conviction in the Contra Costa Superior Court. (*People v. Jacobson*, Case No. 05-00180125-7.) I have also spent a substantial amount of time preparing for a multiple-day civil contempt hearing

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1 in San Mateo Superior Court, including the preparation of two briefs on complex constitutional
2 issues. (*Baptiste v. Goguen*, Case No. CIV-53769.)

3 Given my current schedule, which includes a 10-day vacation in April with my daughter
4 to visit family, I don't believe I can realistically complete the brief until on or about June 2,
5 2025.
6

7 6. Opposing party's position:

No objection

8 On March 27, 2025, I emailed opposing counsel, Nadia Ahmed, and informed her of my
9 intention to request an extension of time to file a Traverse. Ms. Ahmed stated she had no
10 objection to my request.
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13 Respectfully Submitted,
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15 Dated: March 28, 2025

/s/ Jason T. Campbell
Jason T. Campbell
Attorney for Benjamin Morrow

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18 IT IS SO ORDERED
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20 DATED this 31st day of March 2025.

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23 _____
Miranda M. Du, U.S. District Judge

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28 PETITIONER MORROW'S UNOPPOSED MOTION AND DECLARATION IN SUPPORT THEREOF FOR
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court, Northern District of California by using the appellate CM/ECF system on March 28, 2025. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system. Executed on March 28, 2025, in El Cerrito, California.

/s/ Jason T. Campbell
Jason T. Campbell
Attorney for Benjamin Morrow

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